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officer, no presumption of prejudice will arise. *Jones v. State*, 152 Ind. 318, 53 N. E. 222; *Nabors v. State*, 120 Ala. 323, 25 South. 529; *King v. State*, 91 Tenn. 617, 20 S. W. 169.

In connection with the question of what constitutes a separation in fact, the lodging of a jury in hotel rooms has often come into question. It has been held that where the jurors have been placed in rooms opening into a common passage, the several doors being open, and attended by officers who have securely fastened the entrances to the passage, the strictest requirements of the law are satisfied. *State v. Devall*, 51 La. Ann. 497, 25 South. 384; *Kennedy v. Commonwealth*, 2 Va. Cas. 510; *Thompson v. Commonwealth*, 8 Gratt. (Va.) 637. And it is not necessary that the entrance to the passage way be locked. *Thompson v. Commonwealth*, *supra*. But if placed in locked rooms on different floors of the same hotel, there is a separation. *People v. Adams*, *supra*. So if there is no direct connection between the several rooms or that of the attending officer. *Hempton v. State*, *supra*. *Contra*, see *Commonwealth v. Manfredi*, 162 Pa. St. 144, 29 Atl. 404. But an open connection between the rooms containing the jurors has been regarded unnecessary, where an officer is present in each. See *State v. Robinson*, *supra*. And in one jurisdiction it seems that not only may the jurors be lodged in separate rooms not locked, but, while there, the presence of an officer may be dispensed with. See *Wright v. State*, 35 Ark. 631. The mistake of the officer, in the principal case, seems to have been in locking the doors leading from the several rooms into the common passage.

DOWER—PROTECTION OF INCHOATE DOWER RIGHT BY INJUNCTION.—A married man sold valuable oil and mineral lands without the joinder of his wife in the deed. While the husband was still living, the wife sought to enjoin the alienee from drilling for oil on the land, on the ground that she had a right to protect her dower right from waste. *Held*, the defendant will not be enjoined. *Rumsey v. Sullivan* (App. Div.), 150 N. Y. Supp. 287. See NOTES, p. 462.

EXTRADITION—INTERSTATE EXTRADITION—HABEAS CORPUS.—The plaintiff was held on a warrant for extradition in pursuance of a demand of the governor of a State from which it was alleged the plaintiff was a fugitive from justice. The indictment charged the prisoner with conspiracy in escaping from an insane asylum, a crime under the laws of the demanding State. The plaintiff applied to a Federal court for a writ of *habeas corpus* on the ground that if insane he could not be guilty of conspiracy. *Held*, the criminal responsibility of the prisoner is to be determined by the courts of the demanding State under the laws thereof, and such question may not be raised on *habeas corpus*. *Drew v. Thaw*, 35 Sup. Ct. 137.

The power of the United States courts to interfere in interstate extradition proceedings, when such power exists, should be exercised with the utmost caution and only in cases of urgency where the error is